

September 11, 2026

Ms. Patricia Wylezik-Pfeiffer
Township Secretary
Township of Cumru
1775 Welsh Road
Mohnton, PA 19540

Re: Route 10 Traditional
Neighborhood Development (TND)
Sketch Plan
File No. 4022-324

Dear Ms. Wylezik-Pfeiffer:

As requested, we have reviewed the Sketch Plan titled, "Route 10 TND." The proposed development is located along the northbound side of Morgantown Road (S.R. 0010) immediately north of the Flying Hills community. The east side of the property also fronts on Valley Stream Road. The applicant is proposing to construct 106 single-family detached dwellings, 175 townhouses, 256 apartment units, and a 9,270 ft² commercial building for retail shops.

Please note that since the project has been submitted as a sketch plan, no formal action relative to waivers or approvals will be considered at this time. The comments that appear in **bold** typeface require consideration of the Planning Commission and/or action by the applicant to avoid needing formal relief from the referenced ordinance sections.

We have informally reviewed the plans for general conformance with select Township ordinance sections and standards and offer the following comments for your consideration.

SUBMISSION DOCUMENTS

1. Sketch plan titled, "Route 10 TND," prepared by Schlouch Inc., consisting of 4 sheets as indicated below.

Sheet No.	Date		Description
	Originated	Revised	
1	8/31/26	N/A	Cover Sheet
2	8/31/26	N/A	Land Development Plan – Sheet 1
3	8/31/26	N/A	Land Development Plan – Sheet 2
4	8/31/26	N/A	Natural Resources Plan

2. Color site rendering with aerial photograph, prepared by Schlouch Inc.

ZONING ORDINANCE (ORDINANCE NO. 689)

1. The plan proposes to construct 106 single-family detached dwellings, 175 townhouses, 256 apartment units, and a 9,270 ft² commercial building for retail shops on an existing 171.58 acre property. The property appears to consist of two separately deeded, adjacent parcels, designated as Parcel A (approx. 7 acres) and Parcel B (approx. 165+ acres). The site is located along the northbound side of Morgantown Road (S.R. 0010) immediately north of the Flying Hills community. The site is located entirely within the General Industrial (GI) Zoning District, and also within the Traditional Neighborhood (TND) Overlay District where the proposed uses are permitted by right, Sections 606-1.A. & 606-3.C.1).
2. The subject property also accommodates an existing water supply booster station which is considered a public utility use. A public utility is a use permitted by right within the GI Zoning District, Section 410:(B)(17). The plan proposes no changes to the existing booster station with the exception of the access drive which will need to be relocated.
3. The subject property also accommodates an existing telecommunications tower. The telecommunications use is permitted by special exception within the GI Zoning District, but since the telecommunications use already exists on the site, special exception approval will not be required, Section 410:(C)(12). However, telecommunications towers are not permitted within a TND, so it is recommended that the outer boundary of the TND be revised exclude the telecommunications tower. It is noted that the plans propose no direct impact to the tower itself. The access drive serving the tower will be modified to provide access from the development.
4. A very small portion of the subject property is located within the 100-year floodplain; however, none of the proposed construction activity will impact the floodplain areas. Therefore, the plan complies with the Floodplain Overlay District requirements of Section 502.
5. A very small portion of the subject property is located within wetland areas; however, none of the proposed construction activity will impact the wetland areas. Therefore, the plan complies with the Wetlands Overlay District requirements of Section 503.
6. Since Category 3 Steep Slopes occupy more than 10% of the parent tract area, the project is subject to the Steep Slope Overlay District requirements of Section 504:(F). The zoning tables on Sheet 1 of 1 should be revised to reflect that the maximum allowable impervious area percentages have been reduced by 20% for each use, Section 504:(F)(4).

7. Since portions of the proposed development area are forested, the plan is subject to the woodland extraction requirements of Section 505.2. While it does not appear that meeting these requirements will be problematic, it is recommended that a note be added to the plan indicating that all development activity will be subject to any applicable requirements of the Woodland Protection and Management Overlay District, Section 505.
8. Since the site contains several watercourses, the plan is subject to the requirements of the Riparian Buffer Overlay District; however, none of the proposed construction activity will impact the riparian buffer areas. Therefore, the plan complies with the Riparian Buffer Overlay District requirements of Section 506.
9. It appears that some of the proposed buildings will be located within the Transitional Zone of the Airport Overlay District and, therefore, subject to the Airport Zoning Ordinance (Ord. #363), Section 603. While it is anticipated that the proposed construction will comply with Ordinance #363, the applicant should confirm compliance.
10. All future deeds for the lots created by the plan will need to be restricted as necessary to maintain the appropriate use percentages within the development, Section 606-3.A.3). Since the deeds will not be prepared and recorded until after the plan is approved, it is recommended that any deed restrictions be described on the plans. This matter can be addressed during the final plan stage.
11. The applicant will be required to provide a project manual as described in Section 606-3.A.5). The manual will need to be provided with the formal land development plan submission.
12. **It appears that the layout of the townhouses will need to be revised to provide the required 2' staggering described in Section 606-3.A.5)a)iv.**
13. **It appears that many of the townhouse lots have areas less than the minimum required area of 1,900 ft², Section 606-3.C.2), Table 606-3(C)(2). Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
14. **The front yard depths of many of the townhouse lots exceed the maximum permissible depth of 10', Section 606-3.C.2), Table 606-3(C)(2). Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
15. **The proposed building for the retail shop is set back from the street more than the maximum allowable distance of 20', Section 606-3.C.2), Table 606-3(C)(2). Unless**

the applicant is intending to request a variance, the plans should be revised to comply with this section.

16. **Some of the townhouse lots with reverse frontage do not provide a minimum 7' "rear" yard; however, since the reverse frontage sides of these lots are technically front yards, the 7' minimum depth requirement may not apply, Section 606-3.C.2), Table 606-3(C)(2). It is recommended that the zoning officer review this matter and render a determination.**
17. The preliminary plans will need to demonstrate compliance with the applicable open space requirements of Section 606-3.E. It is noted that only 50% of the areas of any surface stormwater management facilities can be credited towards open space, Section 606-3.E.3).
18. The formal land development plans will need to demonstrate that the proposed development will be served by both public water supply and public sewer, Section 606-3.F.2)
19. **It appears that the proposed driveways for the 24' wide townhouses are closer to the property lines than the minimum 4' permitted, Section 606-3.F.4)a). Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
20. While the plans depict boundary lines between the various subareas, the limits of each required subarea (i.e. Neighborhood Edge, Neighborhood General, and Mixed Center) are not entirely clear. Therefore, it is recommended that the plans be revised, or supplemented, to more clearly identify the limits of each required subarea such that the referenced areas can be verified, Section 606-4.
21. **Sections 606-4.A.1), 606-4.B.1), and 606-4.C.1) stipulate that the TND shall consist of the Neighborhood Edge, Neighborhood General, and Mixed Center subareas in accordance with the following area distribution: 25% - 35%, 25% - 40%, and 5% - 10%, respectfully. The subarea percentages are to be determined by dividing the acreage of each subarea by the gross acreage of the "TND parent/original tract area." Rather than considering the entire 170+ acre property as the original tract, the plan establishes an overall TND boundary, within the property, which encompasses 87.20 acres. Since the definition of "original tract" does not appear to prohibit this approach to calculating the subarea composition, it is recommended that the approach be deemed acceptable. However, it is recommended that the Planning Commission, Solicitor, and Zoning Officer review the matter to confirm its acceptability.**

22. **Section 606-4.B. stipulates that the Neighborhood General subarea shall consist of single-family detached dwellings, single-family attached dwellings, and civic buildings. Since the plan does not appear to propose all three (3) of these uses within the subarea, a variance may be required. It is recommended that the Planning Commission, Solicitor, and Zoning Officer review the matter.**
23. **It appears that many, if not all, of the townhouse lots will have depths less than 80', which is the minimum depth required per Section 606-4.B.3). Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
24. **The plans need to clearly demonstrate that at least 10% of the dwelling units within the Neighborhood General subarea are single-family detached dwellings. Similarly, the plans also need to demonstrate that at least 10% of the dwelling units within the Neighborhood General subarea are single-family attached dwellings, Section 606-4.B.4).**
25. **Section 606-4.B.7) stipulates that all lots less than 40' wide shall be provided rear access via an alley; however, many of the townhouse lots that are less than 40' wide are not proposed to have rear access via an alley. Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
26. **Section 606-4.B.8) stipulates that all attached front-loaded garages be set back at least seven feet (7') from the front building faces; however, the required set back is not provided for the proposed townhouses. Unless the applicant is intending to request a variance, the plans should be revised to comply with this section.**
27. **It is unclear as to which portion of the proposed development is to serve as the Mixed Center. It is noted that the plans propose only one (1) non-residential building. This building is identified as a 9,270 ft² building proposed to accommodate retail shops. It appears to be proposed as a single-story structure, and will be located at the far, southwest corner of the development. As measured along the proposed street and sidewalk system, the closest residential lot would be approximately 600' from the proposed shops, and the farthest residential lot from the shops would be more than 4,600' away. Since the retail shops would only be permitted in the Mixed Center subarea, it is assumed that the referenced proposed building is intended to function as a component of the Mixed Center; however, the current plan may not meet the intent of Section 606-4.C. for the following reasons:**
 - a. **It appears that the afore-referenced building will accommodate only commercial uses, but Section 606-4.C.2. requires that buildings in the Mixed**

Center accommodate mixed uses, with residential and office space being provided above a first floor that accommodates retail and commercial uses.

- b. Section 606-4.C. emphasizes the importance of the Mixed Center being centrally located within the TND such that the uses and amenities provided within the Mixed Center are reasonably accessible by walking. However, the plans do not propose to provide the proposed shops in a central location, nor would the shops appear to be in a location that would promote pedestrian patronage. It is noted that the plans do not appear to propose sidewalk between the street and the proposed shops.**
 - c. Section 606-4.C. strongly encourages buildings within the Mixed Center to be located very close to the street, with any off-street parking being provided behind the building. However, the plan proposes to locate most of the off-street parking between the building and the street.**
- 28. Section 606-4.C. requires that the Mixed Center provide a formal, centrally located open space with a minimum area of 10,000 ft² in not more than two (2) locations, each with a minimum area of 5,000 ft². Additionally, a hardscaped plaza shall make up at least 25% of the open space(s). The formal land development plans will need to demonstrate compliance accordingly.
- 29. **It appears that sufficient parking is proposed for both the single-family detached dwellings and the commercial building; however, it appears that there may be a deficiency relative to the townhouses and the apartments. The minimum number of total parking spaces for the townhouses and apartments is 1,078, but it appears that only 1,035 spaces are provided. This number includes the off-street parking areas, on-street parking areas, and the townhouse driveways, Section 606-5.C.4), Table 606-5(C)(4). Therefore, the plans will need to be revised to demonstrate that sufficient parking is provided. Also, it is recommended that the proposed commercial building be included in the parking calculation section of the cover sheet.**
- 30. It is unclear if right-of-ways are being proposed for some of the alleys/roads within the townhouse section of the proposed development. The formal land development plans will need to clearly identify the right-of-way boundaries for all proposed alleys and streets, Section 606-5.D.
- 31. Section 850(B)(4) requires that proposed telecommunications facilities be located a minimum of 200' from any property lines and street right-of way lines. While the plan

will be creating property lines and right-of-way lines within 200' of the existing tower, a variance will not be required as the tower already exists.

32. A landscaping plan prepared in accordance with the Subdivision and Land Development Ordinance will need to be provided, Section 914:(A).
33. An exterior lighting plan prepared in accordance with the Subdivision and Land Development Ordinance will need to be provided, Section 919:(D).
34. All proposed signage will need to be provided in accordance with Article 11. The Planning Commission should determine if this issue needs to be addressed prior to plan approval or if compliance with the sign regulations can be deferred until the building permit stage.
35. The existing booster station along Morgantown Road encroaches into both the required front yard and the side yard along the property line between Parcel A and Parcel B. This condition should be considered a pre-existing non-conformity, Section 1204:(A).

SUBDIVISION AND LAND DEVELOPMENT ORDINANCE (ORDINANCE NO. 690)

1. The plan has been submitted and reviewed as a Sketch Plan, Sections 303 & 402.
2. An Environmental Impact Assessment will be required, Section 405.
3. A Community Facilities Impact Assessment will be required, Section 406.
4. A Traffic Impact Study will be required, Section 407.
5. A Utility Impact Assessment will be required, Section 408.
6. The applicant will be required to contact Governor Mifflin School District to determine where bus stops will be located. It is noted that if the streets remain privately owned, then the school district may require that a single bus stop be established at the intersection of Freemansville Road and Morgantown Road (SR 0010), Section 502:(A)(18).
7. **A waiver from the minimum horizontal curve requirements of Section 502:(D)(3) may be required to permit the proposed alignments of the alleys through the townhouse section closest to Morgantown Road. Consideration of any waiver will be contingent upon the review of the Fire Chief.**
8. **The proposed roadway design does not entirely comply with the minimum separation distance requirements for intersections, which is 200', Section 502:(E)(3).**

Unless the applicant is intending to request a waiver, the plans should be revised to comply with this section.

9. **Section 502:(F)(4) requires that a minimum of three (3) points of vehicular ingress and egress be provided along the existing street (i.e. Morgantown Road).**

Additionally, these access points shall be separated by a minimum distance of 500'. Unless the applicant is intending to request a waiver, the plans should be revised to comply with this section.

10. **Section 502:(I)(4) stipulates that a cul-de-sac street may not serve more than 20 dwellings; however, the plans propose 28 dwellings along the proposed cul-de-sac street at the north end of the development. Unless the applicant is intending to request a waiver, the plans should be revised to comply with this section.**
11. **While an extensive amount of curb and sidewalk is proposed, there do appear to be some sections of road that are proposed to have no curb and no sidewalk. Therefore, partial waivers from, Sections 507:(A) and 507:(B), respectively, may be required.**
12. Since the proposed emergency access drives will be located along a state highway, a Highway Occupancy Permit (HOP) for each drive will be required, Section 509:(J).
13. The applicant will need to demonstrate that the requisite approval has been obtained for the sanitary sewer connection and extension. Also, the applicant will need to address any review comments that may be issued by the Township's sanitary sewer engineer, Section 515:(A).
14. The applicant will need to demonstrate approval of any proposed water main connection and extension by the public water service provider, Section 516.
15. A comprehensive SALDO review will be conducted upon the submission of a formal plan.

STORMWATER MANAGEMENT ORDINANCE (ORDINANCE NO. 690)

1. The applicant will need to demonstrate E&S/NPDES Permit approval prior to Final Plan approval, Section 303.D.
2. Stormwater management plans and calculations will need to be provided with the submission of the formal land development plans. Upon submission of these plans and calculations, a comprehensive stormwater management plan review will be conducted.

Ms. Patricia Wylezik-Pfeiffer

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GENERAL COMMENTS

1. Any issues raised by the Township Fire Chief related to fire safety and/or emergency access will need to be addressed. It is noted that the development will have only one (1) point of roadway access; however, it is noted that two (2) 12' wide emergency access drives are being proposed.
2. Sheet 1 of 1 indicates that the overall property is 171.58 acres; however, Sheet 4 of 4 indicates that the overall property is 170.92 acres. The plans should be revised to address this discrepancy.
3. A separate lot should be provided for the proposed shops and adjacent off-street parking areas. Additionally, it is recommended that the eastern portion of the property that fronts on Valley Stream Road be included in the TND. All of the proposed open space associated with the TND shall be separately deeded and appropriately restricted.
4. **The formal land development plans will need to identify any proposed improvements that are intended to be dedicated to the Township. The Township will then need to decide if it will accept dedication of any of the proposed improvements (e.g. streets and sanitary sewer).**
5. Since the project is located within the Transportation Service Area, a traffic impact fee will be required. Therefore, the applicant should provide trip generation calculations/information so that the number of P.M. peak hour trip ends can be determined for the purpose of calculating the required fee.
6. It appears that portions of the underground electric and telecommunications lines that service the existing telecommunications tower will need to be relocated to accommodate the proposed improvements. Therefore, the applicant will need to coordinate any required relocation work with the owner of the tower.
7. The plans indicate that some of the proposed parking spaces immediately to the north of the proposed shops will encroach into the booster station easement. Therefore, the applicant will need to confirm that the proposed improvements are permitted within easement.

If you have any questions concerning these comments, please do not hesitate to contact me.

Sincerely,



STEVEN K. HOFFMAN, P.E.
Planning Commission Engineer

SKH:aew

cc: Kelsey Frankowski, Esquire
Michael D. Hartman, P.E., Schlouch, Inc.